

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 1:24-cv-20755-KMW**

**AVR GROUP, LLC, TRIDENT ASSET
MANAGEMENT, INC., MICHAEL
DZIURGOT, individually and as the
representatives of a class of similarly
situated persons,**

Plaintiffs,

v.

**ALEBRIJE ENTERTAINMENT, LLC,
CRAIG COLE, MATTHEW COLE,
GUSTAVO MONTAUDON, and John
Does 1-10,**

Defendants.

**DEFENDANTS ALEBRIJE ENTERTAINMENT, LLC and GUSTAVO MONTAUDON
UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 7.1, Defendants, ALEBRIJE ENTERTAINMENT LLC (“Alebrije”) and GUSTAVO MONTAUDON (“Montaudon”) (collectively “Alebrije Defendants”), respectfully requests an extension of time until and including April 21, 2024, to answer, move or otherwise plead in response to Plaintiff’s Complaint.

1. This action was filed on February 27, 2024. [DE #1].
2. The Defendants were served on or about March 1, 2024, that mandated a response date of March 22, 2024. [DE #13].
3. Defendants retained the undersigned counsel on March 21, 2024 and seeks this extension to allow sufficient time to analyze Plaintiff’s allegations and prepare Defendants’

response, particularly in view of the proximity of the retention date and the deadline for its response.

4. On March 21, 2024, Plaintiff's counsel, Ross Good agreed to the requested extension.

5. This is the Defendants' first request to enlarge its responsive pleading deadline, which is currently March 22, 2024.

6. This Motion is brought in good faith and not for the purpose of delay, and the granting of the relief sought herein will not prejudice the parties or the litigation, and Plaintiff does not oppose the relief sought.

7. In accordance with Local Rule 7.1(a)(2) and Section 3I(6) of the CM/ECF Administrative Procedures, Defendants are filing a copy of a Proposed Order herewith and emailing a Word version of the same to the presiding judge at williams@flsd.uscourts.gov.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their Unopposed Motion for an Extension of Time and allow Defendant until April 21, 2024 to file an Answer to or Otherwise Respond to Plaintiff's Complaint.

CERTIFICATE PURSUANT TO S.D. FLA. L.R. 7.1(a)(3)

I HEREBY CERTIFY that on March 21, 2024, Defendants' counsel conferred in good faith with Plaintiff's counsel, Ross M. Good, who consents to the relief requested herein.

Dated: March 22, 2024

Respectfully submitted,

LAW OFFICE OF ADAM I. SKOLNIK, P.A.

/s/ Adam I. Skolnik
ADAM I. SKOLNIK
FLORIDA BAR NO. 728081
ATTORNEY FOR DEFENDANTS
1761 WEST HILLSBORO BOULEVARD, SUITE 207
DEERFIELD BEACH, FLORIDA 33442
TELEPHONE: 561.265.1120
FACSIMILE: 561.265.1828
ASKOLNIK@SKOLNIKLAWPA.COM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 2024, the foregoing document was filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record registered to receive electronic Notices of Electronic Filing generated by CM/ECF.

/s/ Adam I. Skolnik

ADAM I. SKOLNIK